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November 16, 2015

VIA ECFS AND
HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Accepted / Filed

NOV 16 2015

Federal Communications Commission
Office of the Secretary

Re: Request for Confidential Treatment of *Ex Parte* Notice filed in *Telecommunications Carriers Eligible for Universal Service Support* (WC Docket No. 09-197); Q LINK WIRELESS LLC's *Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia*

Dear Ms. Dortch:

Enclosed please find an *Ex Parte* Notice filed on behalf of Q LINK WIRELESS LLC ("Q LINK" or the "Company") in the above-captioned matter. Confidential treatment is requested for certain information provided in the Attachment to the enclosed *Ex Parte* Notice, pursuant to Sections 0.457 and 0.459 of the Commission's rules.¹ The confidential material is clearly marked. The marked information is sensitive company information not available to the public, including trade secrets and commercial information that falls within Exemption 4 of the Freedom of Information Act,² and Q LINK would suffer substantial harm if this information were disclosed.

As required by Section 0.459(b) of the Commission's rules, Q LINK provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for certain information provided in the Attachment to Q LINK's enclosed *Ex Parte* Notice filed November 16, 2015.
2. Q LINK is submitting this information in support of its above-captioned request that it be designated as an Eligible Telecommunications Carrier.
3. The information for which Q LINK seeks confidential treatment contains sensitive trade secrets and commercial information which is privileged and is customarily guarded from competitors.

¹ 47 C.F.R. §§ 0.457 and 0.459.

² 5 U.S.C. § 552(b)(4) & (7).

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4. The wireless telecommunications industry is highly competitive.³ There is competition in the provision of wireless Lifeline service from standard wireless ETCs and the special Lifeline ETCs that have already been designated. Information of the type provided by Q LINK could compromise Q LINK's position in this highly competitive industry by giving its competitors critical data relating to Q LINK's operations.
5. The release of this information will cause substantial competitive harm to Q LINK. Disclosure would give competitors access to privileged information that may affect the actions of those competitors.
6. Q LINK considers this information to be proprietary and confidential and does not distribute such information to any party outside of the Company, with the exception of outside counsel, and to state public utility commissions only when granted confidential treatment.
7. This information is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel and to state public utility commissions that have granted confidential treatment for said information.
8. The information should not be released for public inspection, as it contains proprietary company information that is competitively sensitive. At some point, however, this information will become stale. At minimum, the information should be protected for not less than ten years.

For the foregoing reasons, Q LINK respectfully requests that the Commission provide confidential treatment for the identified information.

Please do not hesitate to contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart

Managing Attorney

Lance J.M. Steinhart, P.C.

Attorneys for Q LINK WIRELESS LLC

Enclosures

cc: Issa Asad
Ryan Palmer
Rebekah Goodheart
Travis Litman
Claude Aiken
Nicholas Degani
Amy Bender

³ See generally *Thirteenth Annual CMRS Competition Report*, 24 FCC Rcd 6185 (2009).

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VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Ex Parte* Notice - *Telecommunications Carriers Eligible for Universal Service Support* (WC Docket No. 09-197); Q LINK WIRELESS LLC's *Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia,*

Dear Ms. Dortch:

On Thursday, November 12, 2015, Lance Steinhart, State and FCC counsel for Q LINK WIRELESS LLC ("Q LINK" or the "Company") and John Nakahata, FCC counsel for Q LINK, along with Q LINK representatives (Issa Asad, CEO; Rafa Carvajal, COO; Paul Turner, President; and Noha Asad, Executive Vice President), met with Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn; Travis Litman, Senior Legal Advisor to Commissioner Rosenworcel; Nicholas Degani, Wireline Legal Advisor to Commissioner Pai; Amy Bender, Wireline Legal Advisor to Commissioner O'Rielly, and Claude Aiken and Trent Harkrader of the Wireline Competition Bureau. We discussed the updates in Q LINK's above-captioned Petition for Designation as an Eligible Telecommunications Carrier ("ETC"), as amended on August 26, 2015.

Issa Asad made a brief introduction and overview of the Company, and emphasized the Company's commitment to comply with all FCC rules and to prevent waste, fraud, and abuse of the Lifeline program. We discussed Q LINK's enrollment processes and procedures regarding fraud prevention, and provided a demonstration of Q LINK's automated customer enrollment system, including the specific checks performed at each stage of the application process in order to verify the applicant's identity and eligibility. Q LINK does not use agents, and its automated system removes any discretion at the point of sale. Moreover, Q LINK not only reviews customer information as it is submitted, and verifies that information against available databases, including NLAD and Lexis/Nexis, but also has a separate compliance review team that reviews the application and associated documentation to ensure that the documentation is appropriate and matches the person submitting the application. Q LINK only ships phones to the customer's verified address, and will not ship phones to a secondary address. Q LINK's automated model, and its patent-pending kiosks once deployed, allow Q LINK to make wireless Lifeline available in less dense areas that have not

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been a focus of other Lifeline providers. In an effort to help close the digital divide, should it be granted ETC designations in the FCC jurisdictions, Q LINK's rate plans will provide Lifeline customers in FCC states with access to data.

Finally, certain aspects of the Second Further Notice of Proposed Rulemaking¹ were discussed, including record retention requirements, national Lifeline eligibility verification, and the FCC's broadband initiative.

Q LINK is committed to meeting the needs of Lifeline customers and to careful stewardship of the Lifeline program, as demonstrated by its unique approach to the customer relationship and history of high standards of compliance. Approval of Q LINK's ETC Petition, as amended, would allow Q LINK to substantially expand the areas where it can serve customers, thereby expanding the availability of telephone and broadband services for low income customers.

Attached is a copy of the presentation deck that was provided at the meeting. Please do not hesitate to contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Q LINK WIRELESS LLC

Attachments

cc: Issa Asad
Rebekah Goodheart
Travis Litman
Claude Aiken
Nicholas Degani
Amy Bender

¹ See *Lifeline and Link Up Reform and Modernization, et al.*, WC Docket 11-42, et al., Second further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (Second Further Notice of Proposed Rulemaking).

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LIFELINE OVERVIEW

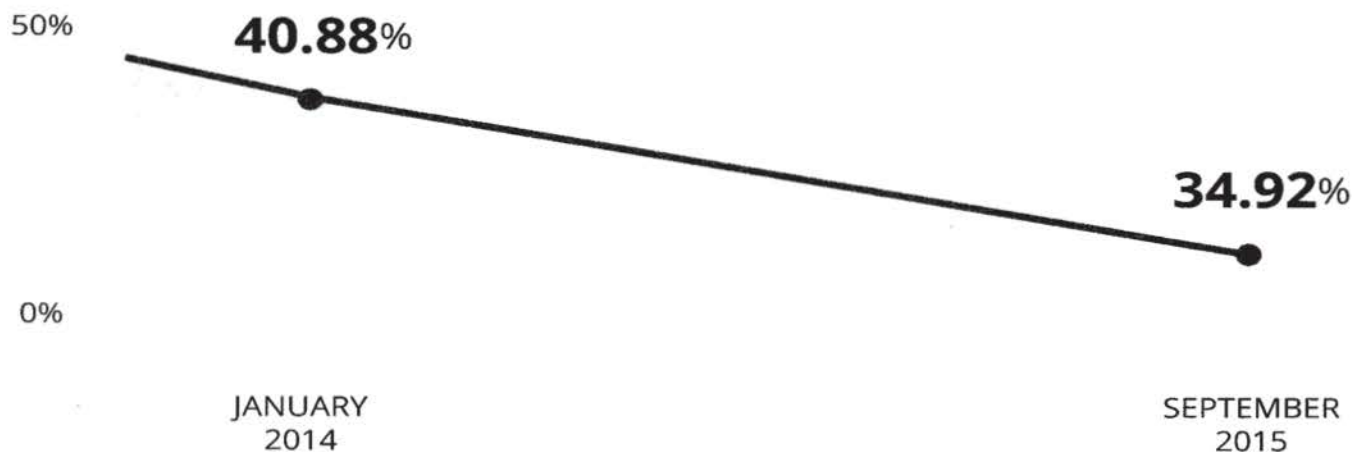
-5.96% ↓ **AVERAGE INCREASE IN NEW SUBSCRIBERS**
in the last 15 months

36,113,041
ELIGIBLE
lifeline lines

23,501,057 ↑
UNSERVED
lifeline lines

34.92% SERVED LIFELINE

100%



FEDERAL NON-JURISDICTIONAL STATES

-4.78% ↓

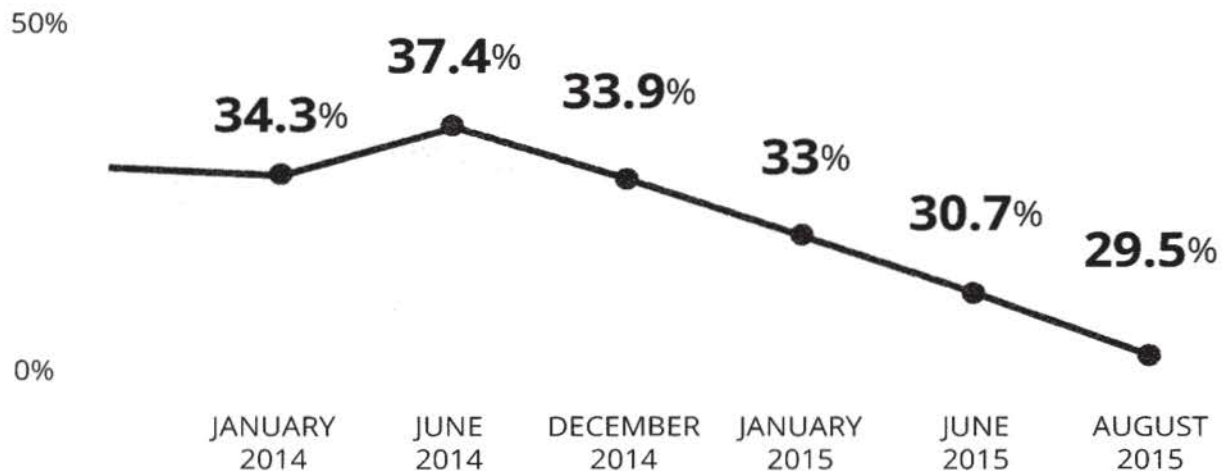
AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

9,708,800
ELIGIBLE
lifeline lines

6,844,322 ↑
UNSERVED
lifeline lines

29.5% SERVED LIFELINE

100%



NEW YORK

-9.53% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

2,675,200

ELIGIBLE

lifeline lines

1,781,375

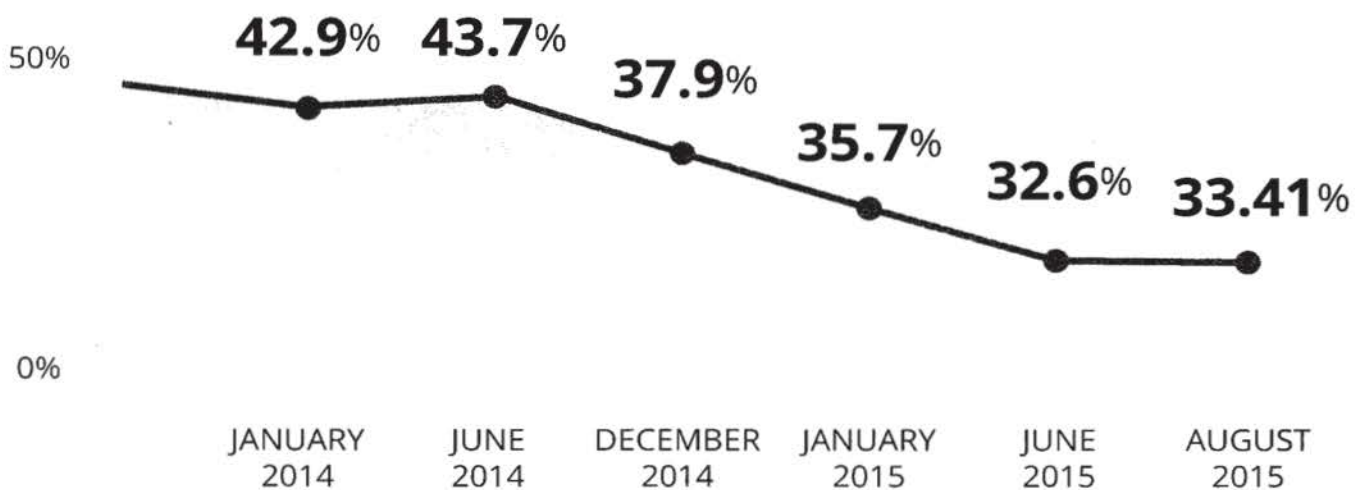
UNSERVED

lifeline lines



33.41% SERVED LIFELINE

100%



FLORIDA

-3.12% ↓

AVERAGE INCREASE IN NEW SUBSCRIBERS
in the last 15 months

2,880,313
ELIGIBLE
lifeline lines

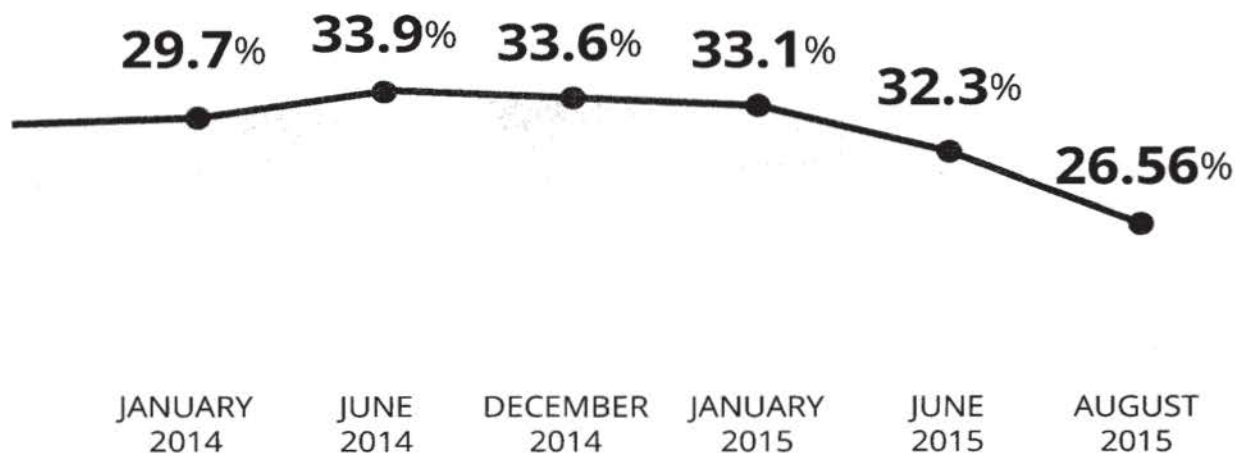
2,115,238 ↑
UNSERVED
lifeline lines

26.56% SERVED LIFELINE

100%

50%

0%



PROPOSED LIFELINE RATES

68 MINUTES FREE TO CUSTOMER	125 MINUTES FREE TO CUSTOMER	250 MINUTES FREE TO CUSTOMER
DATA-CAPABLE HANDSET	DATA-CAPABLE HANDSET	DATA-CAPABLE HANDSET
68 INTERNATIONAL MINUTES	125 ANYTIME MINUTES	250 ANYTIME MINUTES
ROLLOVER MINUTES	ROLLOVER MINUTES	NO ROLLOVER MINUTES
8 TEXTS = 1 MINUTE	8 TEXTS = 1 MINUTE	8 TEXTS = 1 MINUTE
*250 MB DATA PLAN	*250 MB DATA PLAN	*250 MB DATA PLAN

***BROADBAND FEE WAIVED FIRST 90 DAYS. THEREAFTER
250 MB DATA SERVICE FOR \$5 EVERY 90 DAYS.**

ADDITIONAL AIRTIME AVAILABLE FOR PURCHASE:

- \$5** 100 MB data for 30 service days.
- \$10** 100 minutes and 250 MB data for 30 service days.
- \$20** 500 minutes, 4,000 texts, and 20 MB data for 30 service days.
- \$30** 1,000 minutes, 8,000 texts, and 30 MB data for 30 service days.
- \$50** Unlimited minutes, unlimited texts, and 2 GB data for 30 service days.

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